

STATEMENT OF CARL H. MENZER, NATIONAL ASSOCIATION
OF EDUCATIONAL BROADCASTERS, MADE BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION

On Docket No. 6651

"Allocation of Frequencies to the Various Classes of
Non-Governmental Services in the Radio Spectrum from
10 kilocycles to 30,000,000 kilocycles."

October, 1944

My name is Carl H. Menzer, Director of Radio Station WSUI, owned and operated by the State University of Iowa, Iowa City, Iowa. WSUI has been on the air since 1919 and I have been connected with the station since its inception. I am also a member of the Executive Committee of the National Association of Educational Broadcasters on whose behalf I appear today.

The National Association of Educational Broadcasters is an organization representing thirty radio broadcasters who have a common interest, namely: the presentation of educational and cultural material for the betterment of anyone with access to a radio receiver. For 20 years the National Association of Educational Broadcasters has sought to improve educational broadcasting through a constant interchange of ideas and through common action in the interests of educational broadcasting. I should like to offer the Constitution of the National Association of Educational Broadcasters as Exhibit Number 1 and read the preamble of this Constitution:

"Believing that radio is in its very nature one of the most important factors in our national and international welfare, we, the representatives of institutions of higher learning, engaged in educational broadcasting, do associate ourselves together to promote,

by mutual cooperation and united effort, the dissemination of knowledge to the end that both the technical and educational features of broadcasting may be extended to all."

The Association represents active broadcasters operating either their own stations or through commercial outlets. I would like to read a portion of the membership requirements. (a) Any university, college, or public school system of recognized standing engaged in educational broadcasting over a radio station owned and/or operated by it may be elected to membership in this organization. (b) Individuals, colleges, and public school systems or individuals of faculties of recognized educational institutions engaged in educational broadcasting as well as experimental or amateur stations, owned and operated by a recognized educational institution, may become associate members of this association.

As Exhibit Number 2 I offer a list of members and associate members of the National Association of Educational Broadcasters. In this connection it is noted that the active membership of this Association includes 23 licensees of this Commission.

Many of the members are pioneers in radio broadcasting and as such have weathered all of the storms that have beset broadcasting in general and non-profit broadcasting in particular. They know first hand the problems of educational broadcasting and can see clearly in the light of past experience what the future offers in this field. It is our purpose here to outline the technical facilities necessary to carry forth a strong program of educational broadcasting, so necessary to maintain proper program balance under the American System of Broadcasting to which we all owe our existence.

STANDARD AM BROADCASTING IN THE BAND 550 - 1600 KC.:

As long as there is AM broadcasting in the standard band, educational broadcasters must offer their service to the listeners. This is not an attempt to evaluate one system of broadcasting over another, which can be done only after years of experience and research with the various systems. Rather, it is a statement of the fundamental premise that wherever there are radio broadcast listeners, there must be educational broadcasting in its proper proportion.

The educational broadcasters offer cultural, informative and entertainment programs unique to large educational institutions and, in most instances, not available through any other source. These stations are doing a definite job, on a regular day by day basis, without duplication. The programs of the vast majority of our membership are entirely sustaining. The Commission is well aware of the caliber of programs broadcast by our member licensees through the regular filing with it of complete program schedules. It is submitted that a reference to these program schedules clearly indicates their essential nature in the communities served.

It will be noted from Exhibit Number 2, which lists the locations, power, frequency, and time limitations of member stations, that there are vast areas within the United States where the listeners do not have access to programs from any educational broadcasting stations. Furthermore, because of the crowded condition of the standard broadcast band, and because of the technical regulations necessary to prevent interference, all of the educational broadcasters represented operate with restricted facilities that prevent them in large part

from serving the area they would normally be expected to serve. This restriction prevents many of the broadcasters from operating during evening hours, others must use directional antennae that limit coverage in their rightful service area, and some large state institutions find that they cannot have an outlet because of no available facilities. None of the state institutions operating educational stations is able to approach the coverage of their state, either day or night. Therefore, we, as educational broadcasters, respectfully submit to the Commission that the needs of educational broadcasters should be constantly kept in mind in any development or change which might result in the availability of additional AM facilities.

FM BROADCASTING BAND:

It is apparent to the membership of the National Association of Educational Broadcasters that FM broadcasting offers limitless possibilities to improve and expand the educational broadcast service. Some of the members have pioneered in FM broadcasting while others are ready to start in this field as soon as the necessary equipment is available. Some construction permits have already been granted and a number of applications have either been submitted or are in the process of being prepared.

Educational FM stations propose to offer direct to school broadcasting during school hours and adult extension classes during evening hours as well as a balanced program of cultural and informative offerings for general consumption. In the field of direct school broadcasting there are many opportunities to supplement the teaching by people recognized as authorities in their respective fields, especially in rural areas where there is neither time nor talent to teach some subjects properly.

This contemplated program will require both state-wide networks and individual stations operated by local educational institutions. Therefore, the National Association of Educational Broadcasters endorses the recommendations of the United States Office of Education for a total of fifteen channels for non-commercial educational broadcasting. In order to operate state-wide networks so that rural areas may be adequately served, the power restriction of 1,000 watts for educational stations should be removed. It is difficult to see why such a limitation was written into the rules in the first place. There is no reason why the technical facilities for educational broadcast stations should be treated on a basis different from that applying to broadcasting in general. It is the position of our Association that recognized educational institutions, or any other applicant with a definite educational purpose in mind, should have the maximum opportunity to serve the greatest area and the greatest number of people consistent with the recognized purposes of the individual applicant.

Educational broadcasting wishes to take full advantage of the high quality offered in the present system of FM transmission and, therefore, the National Association of Educational Broadcasters endorses the technical recommendations of RTPB panel 5 for 200 kilocycle channels.

FACSIMILE AND TELEVISION:

It has long been established that combined audio-visual aids are much more effective than either separately. Therefore, the place of educational broadcasting in facsimile and television is unquestioned. Practically the entire lecture-teaching process is embodied in such a system.

Facsimile offers a written record of material which can be used during the progress of a given educational broadcast for purposes of illustration and then later for reference and review material. The proposed use includes the transmission of illustrations, pictures, maps, and outlines. The only problem involved will be facilities to transmit material fast enough to supplement all the services that will be using educational broadcasting. The National Association of Educational Broadcasters will endorse any application of facsimile to FM broadcasting so long as there is no material impairment of FM audio fidelity. Many of the member stations contemplate the use of facsimile as soon as standards are set and reliable equipment is available.

Television broadcasting offers an intimate, flexible, and timely approach in educational programming. In the transmission of current events alone lies reason enough for all educational broadcasters to look to television. The additional possibilities of demonstration lectures, visits to points of educational interest, and televised field trips, make it an invaluable educational tool.

Several members of the National Association of Educational Broadcasters have pioneered in television broadcasting and from their vast experience in this field they have learned the folly of trying to set up an expanded program of television service until definite standards have been set up. Educational institutions cannot stand the rapid obsolescence that hastily defined standards might lead to. The membership will be willing to take up television just as soon as standards are definitely set, and as soon as production makes television receiving equipment within the range of restricted school budgets. There is no type of programming that fits television as well as educational broadcasting.

In the allocation of facilities for television broadcasting and relay service, the National Association of Educational Broadcasters recommends that provision be made for state-wide coverage for educational broadcasters. Our only recommendations on the technical standards to be established for television are that they be far-sighted enough to meet the needs of high quality transmission for some time to come and yet fall within the realm of practical application in the not too distant future.

Scanned from the National Association of Educational Broadcasters Records
at the Wisconsin Historical Society as part of
"Unlocking the Airwaves: Revitalizing an Early Public and Educational Radio Collection."



A collaboration among the Maryland Institute for Technology in the Humanities,
University of Wisconsin-Madison Department of Communication Arts,
and Wisconsin Historical Society.

Supported by a Humanities Collections and Reference Resources grant from
the National Endowment for the Humanities



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